REMARKS

Claims 88-179 are pending in this case.

Claims 88-179 stand rejected under 35 U.S.C. § 103(a).

Claims 151-155 are cancelled without prejudice.

5   Before refuting the numerous § 103(a) rejections individually, Applicants respectfully suggest that the Examiner has made no *Prima Facie* case for combining Rainis et al. (US 6,310,873 A), Jacobson (US 6,735,701 B1) and Berlin et al. (US 5,915,093) using the criteria set forth in MPEP 706.02(j). Specifically, Applicants suggest that the teaching or suggestion to the claimed combination and the reasonable expectation of success are not both found in the prior art.

10   Rainis relates to an interface between Internet telephony systems and standard telephone systems. Berlin relates to purchasing content on the Internet using prepaid access units. Jacobson relates to maintaining policy compliance on a computer network. Applicants respectfully submit that the fields of technology of these three references are completely separate and that a stronger motivation than that provided by the Examiner must be provided to make a *Prima Facie* case to

15   combine them.

Rainis describes only Internet telephony systems and methods for providing Internet telephony. According to Rainis (Fig. 2 and Col 2, line 64 to Col. 4, line 8), a user selects a telephone service provider (TSP), as opposed to an Internet service provider (ISP), from a list of service providers. Selection is based upon a list of TSP rate quotes. A call using the selected TSP

20   is then placed. Applicants note that a caller would have no motivation (as suggested by the Examiner) to search and/or purchase on the Internet because they would naturally devote their attention to the phone call.

Berlin describes limiting information retrieval to pre-defined topics. To that end, Berlin specifies (Col. 4; line 26 to Col. 5; line 30) use of a "central computer" which has, or has access

25   to, the desired information. In cases where the central computer does not contain the desired information, the central computer communicates with one or more remote computers to procure the required information. All of this , as Berlin says (Col. 5; lines 14-16), is so "The user need not understand how to search the Internet because the user purchases a disc" (possibly interpreted as an account) "that is associated only with information of the type in which the user is interested." In

30   summary, Berlin teaches "preventing access" to the Internet. Even though Berlin mentions in the background that Internet searching is possible did teach Internet searching, there is no motivation

to combine selecting a TSP based upon a rate quote (as taught by Rainis) with Internet searching as allegedly taught by Berlin.

While Jacobson discloses use of a "virtual personality", the "virtual personality" of Jacobson is employed as a substitute for an unavailable person. There is no motivation or

5 suggestion that this type of virtually personality, which is used when a person is unavailable, would have any utility or advantage in facilitating customized Internet access as suggested by the Examiner. In addition Applicants understand that Jacobson's use of the phrase "virtual personality" has caused confusion, but respectfully suggests that the phrase can have different meanings in different fields.

10 In summary, Applicants respectfully suggest that the Examiner has made no *Prima Facie* case for combining Rainis, Jacobson and Berlin according to the criteria of MPEP 706.02(j). The Examiner's attempt to combine the three references seems to have been motivated by review of Applicants' disclosure.

Applicants now relate to the individual § 103(a) rejections set forth in the Office Action.

15 Claims 88-123, 125-128, 129-134, 138-141 and 156-171 are rejected under § 103(a) as being unpatentable over Rainis et al., Jacobson and Berlin et al.

The § 103(a) rejection based upon Rainis, Jacobson and Berlin covers independent claims 88, 125, 128, 131 and 138. Each of these independent claims is addressed separately in order to make it more clear that the entire § 103(a) rejection based upon Rainis, Jacobson and Berlin is

20 insupportable. Applicants will show for each independent claim that, even if motivation to combine the three references existed, which it does not, such combination would not produce what is claimed.

With regard to claim 88, the Examiner has suggested that Rainis discloses Internet prepayment, Berlin discloses searching for something on the Internet and Jacobson teaches virtual

25 personality. Applicants respectfully disagree and respectfully submit that the Examiner has not made a *Prima Facie* case of obviousness as at least one limitation of the claim is not found in the art combination suggested by the Examiner.

Claim 88 as currently before the Examiner is directed towards:
A method of pre-paid Internet access, comprising:

30 *accessing an Internet using an anonymous prepaid account, which access deducts from a balance of said account; and*
performing one or more activities not directly related to an issuer of said account and at most indirectly related, while connected to said Internet, which activities incidentally modify said balance additionally to said accessing, which activities are other

than a requesting by an accessor of said account to transfer funds to said account from another account.(emphasis added)

The Applicants point to the underlined portions of claim 88 as limitations not provided by the three references, even in combination.

Rainis describes only Internet telephony systems and methods for providing Internet telephony. Although Rainis specifies use of digital cash (Col. 3, line 33) which could be construed as an anonymous prepaid account, digital cash is described only as a means of paying for a phone call in advance, and not as a means of accessing the Internet.

Purchases, such as purchase of a phone call as described by Rainis, is specifically excluded from claim 88 by the limitation *"incidentally modify said balance additionally to said accessing, which activities are other than a requesting by an accessor of said account to transfer funds to said account from another account."*

Berlin, in the background section (Col 2, lines 31-48), mentions pre-paid accounts for computer access.

Berlin describes "prepaid access units" which can be "spent" while connected to the Internet (Fig 6A of Berlin). Retrieval of content using prepaid access units as taught by Berlin is a purchase of content which involves a transfer of funds from one account to another. Purchases are specifically excluded from claim 88 which includes the limitation "...which activities are other than a requesting by an accessor of said account to transfer funds to said account from another account."

Additionally, when Berlin describes his own invention, he teaches against searching. Berlin's main purpose is to limit information retrieval to pre-defined topics. To that end, Berlin specifies (Col. 4; line 26 to Col. 5; line 30) use of a "central computer" so "The user need not understand how to search the Internet because the user purchases a disc that is associated only with information of the type in which the user is interested." (Col. 5; lines 14-16). Thus, Berlin teaches "preventing access" to the Internet, which is the opposite of the claimed "accessing an Internet".

The Examiner relies upon Jacobson only to provide a "virtual personality". Applicants note that no virtual personality is claimed in claim 88. Applicants respectfully suggest that Jacobson does not reach accessing or performing as instantly claimed. Specifically, Jacobson does not teach *"incidentally modify said balance additionally to said accessing, which activities are other than a requesting by an accessor of said account to transfer funds to said account from another account."* as instantly claimed.

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Therefore, Applicants respectfully submit that the Examiner has made no *Prima Facie* case for the rejection under 103(a) based upon Rainis, Jacobson and Berlin. Even assuming that one of ordinary skill in the art would find motivation in one of the three references to combine with the other two, which they would not, such combination does not produce what is instantly

5   claimed because none of the references provides incidental modification other than a request to transfer funds.

Claims 89-123 all depend, directly or indirectly, from claim 88. Without advancing any additional arguments, these claims are in condition for allowance at least by virtue of their dependence from an allowable base claim.

10   With respect to Claim 128, the Examiner has formulated no specific rejection of the independent claim.

Claim 128 is directed towards:

A method of Internet connection, comprising:

dialing up an Internet access number, to start a session;

15   *selecting an ISP (Internet Service Provider) after said dialing;*

indicating said selected ISP during said session;

connecting to the Internet after said indicating, using said selected ISP; and

deducting for said connection from a pre-paid account, said account being independent of

said selected ISP. (emphasis added)

20   Applicants respectfully submit that none of the three references teach or suggest the underlined limit in claim 128. Therefore, the Examiner has not made a *Prima Facie* case for an obviousness rejection because even if motivation to combine the three references were present, which it is not, such combination would not produce what is claimed in claim 128. Claims 129-130 depend from claim 128. Without advancing any additional arguments, these claims are in

25   condition for allowance at least by virtue of their dependence from an allowable base claim.

With respect to Claim 131, the Examiner has formulated no specific rejection of the independent claim.

Claim 131 is directed towards:

A method of Internet billing, comprising:

30   *connecting to an Internet via a cost server;*

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accessing a plurality of Internet sites via said cost server, using an Internet interaction protocol, which access does not require additional actions beyond selecting a URL (Uniform Resource Locator) by a user; and

generating a debit, which debit accumulates charges at a different rate for each accessed

5   *site.*

Applicants respectfully submit that none of the three references teach or suggest the underlined limits in claim 131. Therefore, the Examiner has not made a *Prima Facie* case for an obviousness rejection because even if motivation to combine the three references were present, which it is not, such combination would not produce what is claimed in claim 131. Claims 132-

10   134 depend from claim 131. Without advancing any additional arguments, these claims are in condition for allowance at least by virtue of their dependence from an allowable base claim.

With respect to Claim 138, the Examiner has formulated no specific rejection of the independent claim.

Claim 138 is directed towards:

15   *A method of configuring a computer, comprising:*

connecting to an Internet, using an arbitrary computer;

downloading from the Internet a virtual personality; and

automatically updating the arbitrary computer using the virtual personality, to be configured as indicated by said personality.

20   Applicants respectfully submit that none of the three references teach or suggest the underlined limits in claim 138. Therefore, the Examiner has not made a *Prima Facie* case for an obviousness rejection because even if motivation to combine the three references were present, which it is not, such combination would not produce what is claimed in claim 138. Claims 139-

141 depend from claim 138. Without advancing any additional arguments, these claims are in

25   condition for allowance at least by virtue of their dependence from an allowable base claim.

Claim 124 is rejected under § 103(a) as being unpatentable over Rainis et al., Jacobson Berlin et al., and Yamanouchi et al. (US 5,105,268 A1).

With regard to claim 124, the Examiner has stated that Rainis, Jacobson and Berlin fail to teach first and second pre-paid accounts/cards as instantly claimed. The Examiner maintains that

30   Yamanouchi discloses first and second prepaid card accounts wherein a user can transfer funds between them. Stating "motivation to combine these references is to facilitate customized Internet access with seamless funds transfer".

Applicants respectfully disagree and respectfully submit that the Examiner has made no *Prima Facie* case of obviousness against claim 124 because Yamanouchi relates to broadcast television which is a different field of art from Internet access and the Examiner has not explained why one would take teachings from one art field and copy them into another art field characterized by different problems.

Claim 124 is directed towards:

> *A method of maintaining pre-paid account, comprising:*
> *providing a first pre-paid Internet access account associated with personalized information;*
> *providing a second pre-paid card; and*
> *transferring at least a part of a balance between the account and the card.*

Yamanouchi et al. teaches accounts with contract information to select a subset of broadcast television channels from among a larger number of broadcast television channels. It is not at all clear why one of ordinary skill in the art would be motivated to combine a teaching from the field of broadcast television to Internet access accounts as instantly claimed.

Applicants respectfully suggest that it is the Applicants' disclosure which has motivated the Examiner's attempt to combine the four references. Since there is no motivation to combine the four references in the way suggested by the Examiner in the references themselves, Applicants respectfully suggest that the Examiner has made no *Prima Facie* case for the rejection under 103(a) based upon Rainis, Jacobson, Berlin and Yamanouchi.

Claims 125-130 are rejected under § 103(a) as being unpatentable over Rainis et al., Jacobson, Berlin et al., and Lavey Jr. et al. (US 6,023,698 A).

With respect to Claim 125, the Examiner has suggested that Lavey Jr. discloses that user identification and information and password can be stored by a client and automatically passed to the ISP when a connection to the ISP is established. The Examiner suggests that this can cause transfer to a second ISP.

Applicants respectfully suggest that the Examiner has made no *Prima Facie* case for the rejection under 103(a) based upon Rainis, Jacobson, Berlin and Lavey Jr. Even assuming that one of ordinary skill in the art would find motivation in one of the four references to combine with the other three, which they would not, such combination does not produce *"automatically selecting, by the connection server, an ISP (Internet Service Provider), from a plurality of available providers"* as instantly claimed. The Examiner states that Rainis, Jacobson and Berlin do not teach "automatically selecting" as instantly claimed and relies upon Lavey Jr. to provide this

092/01939 A03

element of the claim. Applicants respectfully suggest that Lavey Jr. teaches selection from the client side, as opposed to "by the connection server" as instantly claimed.

Independent claim 125 is directed towards:

> *A method of Internet access, comprising:*
> *detecting a connection request, by a connection server;*
> *automatically selecting, by the connection server, an ISP (Internet Service Provider), from a plurality of available providers, for the connection; and*
> *automatically performing the connection using the automatically selected ISP. (emphasis added)*

Applicants note that Rainis actually teaches against such a practice by manually selecting a TSP based upon a list of rate quotes.

As the Examiner has indicated, Lavey Jr. describes use of tokens supplied by a user client as a means of user authentication (see col. 16; lines 1-35 of Lavey Jr.). Because the tokens are provided by the client, Lavey Jr. does not teach "automatically selecting, by the connection server, an ISP" as instantly claimed. In fact, Lavey Jr. teaches an opposite practice in which the server responds to a request, in the form of a token, made from the client side.

In summary, even if motivation to combine the four references were present, which it is not, such combination would not produce what is claimed in claim 125 because Lavey Jr. teaches an opposite practice in which selection is performed on the client side.

Claims 126-127 are in condition for allowance at least based upon their dependence from an allowable base claim.

Claims 135-137 are rejected under § 103(a) as being unpatentable over Rainis et al., Jacobson, Berlin et al., and Khan et al. (US 6,199,054 A).

The Examiner has stated that Rainis, Jacobson and Berlin fail to teach modifying said rate responsive to a quality of service. The Examiner has suggested that Khan discloses "current rate dynamically updated based on various parameters". Applicants respectfully disagree. Khan does not teach "*modifying said rate responsive to a quality of service*" as instantly claimed. Applicants respectfully suggest that the Examiner has made no *Prima Facie* case for rejection because combination of the four references would not produce what is claimed.

Independent claim 135 is directed towards:

> *A method of pre-paid access, comprising:*
> *providing a pre-paid account;*
> *connecting to an Internet, debiting said account for said connection at a debit rate; and*
> *modifying said rate responsive to a quality of service for said connection.*

The Examiner has stated that Khan describes "...current rate dynamically updated based upon various parameters..." citing column 2 line 20 to column 3 line 5 of Khan. However, these

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portions of Khan describe only dynamic update of billing amount as opposed to billing rate. The difference between billing amount and billing rate is crucial because a rate can be modified "responsive to a quality of service" while an amount is not subject to such modification because it is determined prior to provision of the service.

5   Khan is interested in telling a user the price of a download potentially including several items. According to Khan, as items are added/removed to/from the "download envelope", a displayed total debit amount is dynamically updated. However, Khan does not teach, hint or fairly suggest *"modifying said rate responsive to a quality of service for said connection"* as instantly claimed. For example, there is no hint or suggest in Khan that billing amount is affected by
10   bandwidth supplied during a download.

In summary, even if motivation to combine the four references were present, which it is not, such combination would not produce what is claimed in claim 135 because Khan teaches only adjusting debit amount in response to an amount of content requested for download, and not *"modifying said rate responsive to a quality of service for said connection"* as instantly claimed.

15   Applicants respectfully suggest that the Examiner has made no *Prima Facie* case for rejection of Claim 135 under § 103(a) based upon Rainis et al., Jacobson, Berlin et al., and Khan bcause combination of the four references would not produce what is claimed. Claims 136-137 are in condition for allowance at least based upon their dependence from an allowable base claim.

Claims 142-145 are rejected under § 103(a) as being unpatentable over Rainis et al.,
20   Jacobson, Berlin et al., and Del Riccio et al. (US 2,769024 A).

The Examiner has stated that Rainis, Jacobson and Berlin fail to teach a prepaid advertising system. The Examiner has suggested that Del Riccio discloses an advertising distribution system citing columns 1 and 2 of Del Riccio. However, examination of the cited portions of Del Riccio suggests that Del Riccio is related to a different field of art. Specifically,
25   Del Riccio teaches (Column 1) "The invention relates to prepaid entertainment distribution systems...". The word advertising does not seem to appear in Del Riccio in any form.

Applicants respectfully suggest that the Examiner has not made a *Prima Facie* case for rejection of claim 142 because combination of the four references would produce neither *"slotting advertisements in available advertising slots in an Internet"* nor *"controlling, by a user, an actual*
30   *presentation of said advertising responsive to a real-time status of said account"* as instantly claimed.

Independent claim 142 is directed towards:

A method of placing an advertisement using a pre-paid advertising account, comprising:

slotting advertisements in available advertising slots in an Internet;

charging said slotting to said pre-paid account; and

controlling, by a user, an actual presentation of said advertising responsive to a real-time status of said account.(emphasis added)

5   Applicants agree with the Examiner that Rainis, Jacobson and Berlin fail to teach a prepaid advertising system. Despite the Examiner's statement, Applicants have made a reasonable effort to identify *"slotting advertisements in available advertising slots in an Internet"* or *"controlling, by a user, an actual presentation of said advertising responsive to a real-time status of said account"* in these three references and has been unable to do so. Therefore, in order to

10   make a *Prima Facie* case for rejection, the Examiner must at least identify both of the claimed elements in the cited art.

With respect to Del Riccio, the Examiner has not indicated which of the claimed elements are allegedly present.

Applicants have reviewed Del Riccio and respectfully suggests that Del Riccio describes

15   coin operated televisions in which pre-payment is made by depositing coins in a television receiver. The Del Riccio reference does not seem to teach any methods or equipment whereby an advertiser could determine on which television sets an advertisement will appear by means of a prepaid account. Thus Del Riccio does not teach or suggest *"slotting advertisements in available advertising slots in an Internet"* or *"controlling, by a user, an actual presentation of said*

20   *advertising responsive to a real-time status of said account"*

In addition, it is not at all clear how prepayment by coins, as described by Del Riccio, could be implemented in an Internet based system as instantly claimed.

In summary, even if motivation to combine the four references were present, which it is not, such combination would not produce what is claimed in claim 142 because neither *"slotting*

25   *advertisements in available advertising slots in an Internet"* nor *"controlling, by a user, an actual presentation of said advertising responsive to a real-time status of said account"* is present in any of the four references.

Applicants respectfully suggest that the Examiner has made no *Prima Facie* case for rejection of Claim 142 under § 103(a) based upon Rainis et al., Jacobson, Berlin et al., and Del

30   Riccio. Claims 143-145 are in condition for allowance at least based upon their dependence from an allowable base claim.

Claims 146-150 are rejected under § 103(a) as being unpatentable over Rainis et al., Jacobson, Berlin et al., and Garrick et al. (US 5,968,125 A). This rejection covers two independent claims, 146 and 147.

Applicants respectfully suggest that the Examiner has made no *Prima Facie* case for this rejection because none of the references teach WWW site construction or maintenance "responsive" to a "virtual personality" as instantly claimed.

Claim 146 is directed towards:

Software for WWW site construction, comprising:
a user input unit for receiving requests from a user;
a personality receiving unit for receiving a virtual personality associated with said user;
a selection display unit for selecting options to said user, which selections are displayed responsive to said received virtual personality, and which user input is used to select from said selections; and
a site constructor which generates a portion of said site responsive to selections by a user.

Claim 147 is directed towards:

A method of WWW site maintenance, comprising:
determining a current virtual personality of a user associated with a particular WWW site; and
modifying a presentation of said site responsive to said determined virtual personality.

The Examiner states that neither Rainis nor Berlin describes use of virtual personalities.

The Examiner also states neither Rainis nor Jacobson nor Berlin teaches WWW site construction or maintenance.

The Examiner states that Garrick discloses that WWW sites can be constructed using commercially available software.

Therefore, in order to make a prima facie case for:

a personality receiving unit for receiving a virtual personality associated with said user;
a selection display unit for selecting options to said user, which selections are displayed responsive to said received virtual personality, (claim 146)

OR

determining a current virtual personality of a user associated with a particular WWW site; and
modifying a presentation of said site responsive to said determined virtual personality. (claim 147)

the Examiner must demonstrate that a virtual personality as taught by Jacobson would be used in WWW site maintenance/construction as taught by Garrick.

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Jacobson teaches use of virtual personalities (Col. 7, lines 10-60) only in the context of a policy training process. The personality is described as including policy information previously submitted by a screen personality including policy suggestions, individual feedback, and onscreen comments provided during previous training sessions. There is no hint or fair suggestion in Jacobson that virtual personalities include any determinants which could influence an appearance of WWW site constructed using a markup language (e.g. HTML or active X).

Additionally, there is no suggestion by Jacobson why it would be useful or advantageous to permit any of the stated components of a "virtual personality" to be reflected in a WWW site. Thus, Jacobson's use of the term "virtual personality" would not enable one of ordinary skill in the art to use a virtual personality in site construction and/or maintenance without undue experimentation.

Garrick teaches only WWW site construction using commercially available software and does not mention virtual personalities in any context.

In summary, even if there were motivation to combine all four references, which there is not, such combination would not produce WWW such construction (or maintenance) in "response" to a "virtual personality" of a user as instantly claimed.

Applicants respectfully suggest that the Examiner has made no *Prima Facie* case for rejection of Claim 146 or claim 147 under § 103(a) based upon Rainis et al., Jacobson, Berlin et al., and Garrick. Claims 148-150 are in condition for allowance at least based upon their dependence from an allowable base claim.

Claims 151-179 are rejected under § 103(a) as being unpatentable over Rainis et al., Jacobson, Berlin et al., and Skillen et al. (US 6,098,065 A). This rejection encompasses independent claims 151, 156, 167, 168, 172 and 175. In order to establish that the rejection is insupportable, the independent claims are broken down into groups. Some of the independent claims do not seem to have been specifically rejected by the Examiner using these four references. Independent claim 151 and dependent claims 152-155 have been cancelled without prejudice in order to expedite prosecution.

With respect to claim 156, Applicants respectfully suggest that the Examiner has made no Prima Facie case for rejection because combination of the four references would not produce *"interacting with an Internet"* modified by *"personal information"* associated with *"an anonymous prepaid account"*

The Examiner has stated that Rainis et al., Jacobson and Berlin et al. do not teach implicit commands.

The Examiner has suggested that Skillen teaches implementation of an implicit command based upon user arguments and/or changes in user arguments, within a single session.

5   Claim 156 is directed towards:

> *A method of manipulating a pre-paid card, comprising:*
> <u>*receiving an anonymous pre-paid account;*</u>
> <u>*associating personal information with said account;*</u> *and*
> *interacting with an <u>Internet</u> using said account, which <u>interaction is modified by said</u>*
10   <u>*personal information.*</u>

Applicants find no hint or suggestion in Skillen that associating personal information with an anonymous prepaid account, as opposed to a single user session, is necessary, advantageous or even feasible as a means of providing an implicit command.

Skillen teaches only tracking behavior of a user during a single session in order to
15   formulate an implicit command to search a database of products for sale. According to Skillen, the behavior, which the Examiner seems to equate with "personal information", is not associated with the "anonymous account" as instantly claimed, but rather with a session. Skillen teaches (Col 5, lines 29 to 36) that the implicit command is based on the user's argument and changes in that argument. Skillen does not teach or imply that there is any reason to, or possibility of, correlating
20   two or more sessions to a single user by linking the "personal information" to an "anonymous prepaid account" which could serve to indicate that a same user is present in two or more sessions.

Thus, even if there were motivation to combine the four references, which there is not, such combination would not produce an implicit command including "receiving an anonymous pre-paid account and associating personal information with said account" and "interacting with an
25   Internet using said account, which interaction is modified by said personal information" as claimed in claim 156.

Applicants respectfully suggest that the Examiner has made no *Prima Facie* case for rejection of Claim 156 under § 103(a) based upon Rainis et al., Jacobson, Berlin et al. and Skillen because combination of the references would not produce what is claimed. Claims 157-166 are in
30   condition for allowance at least based upon their dependence from an allowable base claim.

Applicants respectfully suggest that the Examiner has made no *Prima Facie* case for rejection of claims 167 and 175 because there is no indication in any of the four references of "determining a quality of said activity; and adding to said account responsive to said determined quality, if said quality is deemed unsatisfactory." (Claim 167) or *"providing an indication that*

said activity was unsatisfactory; and receiving a refund to said pre-paid account, responsive to said indication."(Claim 175)

With respect to claims 167 and 175, the Examiner does not appear to have formulated any specific rejection. The Examiner indicates only that Rainis et al., Jacobson and Berlin do not teach

5   an implicit command and that Skillen teaches an implicit command.

Claim 167 is directed towards:

A method of calculating a pre-paid account balance, comprising:
deducting from said account responsive to activities charged to said account, which activities include an interaction with an Internet;
10   *determining a quality of said activity; and*
adding to said account responsive to said determined quality, if said quality is deemed unsatisfactory. (emphasis added)

Claim 175 is directed towards:

15   *A method of satisfaction guarantee, comprising:*
performing an activity over an Internet using an anonymous prepaid account;
providing an indication that said activity was unsatisfactory; and
receiving a refund to said pre-paid account, responsive to said indication.
(emphasis added)

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Rainis (Col 5, line 66 to Col. 6, line 4) describes rate quotes which indicate a promised quality of service. However, Rainis does not describe any way of "determining a quality of said activity" or "providing an indication that said activity was unsatisfactory" as instantly claimed.

Additionally, Rainis does not teach, hint or fairly suggest that there is any reason, or even

25   possibility, to issue a refund.

Even if Rainis did suggest the possibility of issuing a refund, which Rainis does not, there is no suggestion that a refund to a pre-paid and/or anonymous pre-paid account is desirable, advantageous or even feasible.

The other three references do not seem to teach or fairly suggest the underlined limits in

30   claims 167 and/or 175.

Therefore, even if there were motivation to combine Rainis, Jacobson, Berlin and Skillen, which there is not, such combination would not produce what is claimed in claim 167 and/or in claim 175.

Applicants respectfully suggest that the Examiner has made no *Prima Facie* case for

35   rejection of Claim 167 and Claim 175 under § 103(a) based upon Rainis et al., Jacobson, Berlin et al. and Skillen because combination of the four references would not produce what is claimed.

Claims 176 to 179 are in condition for allowance at least based upon their dependence from an allowable base claim.

With respect to claim 168, the Examiner does not appear to have specifically rejected independent claim 168 in that the rejection of claims 151-179 relates to implicit commands (as

5 allegedly taught by Skillen). Claim 168 does not contain any limitation which could be construed as an implicit command.

Claim 168 is directed towards:

A method of doing business, comprising:
producing a plurality of pre-paid cards for interacting with the Internet and purchasing

10 *over the Internet; and*
selling said cards to individual customers.

Applicants respectfully suggest that the Examiner has made no Prima Facie case for rejection of claim 168 because none of the four references teach "producing a plurality of pre-paid

15 cards for interacting with the Internet and purchasing over the Internet"; and "selling said cards" as instantly claimed. Thus, even if there were motivation to combine Rainis, Jacobson, Berlin and Skillen, which there is not, such combination would not produce methods as claimed in claim 168.

Applicants respectfully suggest that the Examiner has made no *Prima Facie* case for rejection of Claim 168 under § 103(a) based upon Rainis et al., Jacobson, Berlin et al. and Skillen.

20 Claims 169-171 are in condition for allowance at least based upon their dependence from an allowable base claim.

With respect to claim 172, the Examiner does not seem to have specifically rejected the claim using the cited art. The Examiner states only that Rainis et al., Jacobson and Berlin et al. do not teach an implicit command and that Skillen teaches an implicit command. It is not clear what

25 implicit command appears in claim 172 and how Skillen teaches a command of that type.

Applicants respectfully suggest that the Examiner has made no *Prima Facie* case for rejection because there is no clear demonstration that all of the claimed limitations are found in the cited references.

Claim 172 is directed towards

30 *A configurable computer, comprising:*
a computer having production software stored in association therewith;
software loaded on said computer, which software configures said production software to
match a user, responsive to personalization information provided by said user;
usage tracking software for charging for the use of said computer; and

a data port for providing said personalization information by said user.

Applicants find no hint or suggestion in any of the four references of any of the underlined claim limitations in claim 172.

Applicants respectfully suggest that the Examiner has made no *Prima Facie* case for

5   rejection of Claim 172 under § 103(a) based upon Rainis et al., Jacobson, Berlin et al. and Skillen. Claims 173-174 are in condition for allowance at least based upon their dependence from an allowable base claim.

All currently pending claims, 88 to 150 and 156 to 179, are in condition for allowance.

Prompt notice of allowance is earnestly and respectfully requested. If, however, the

10 Examiner is of the opinion that a telephone conversation may forward the present application toward allowance, Applicants respectfully request that the Examiner call the undersigned at 1 (877) 428-5468. Please note that this is a direct *toll free* number in the US that is answered in the undersigned's Israel office. Israel is 7 hours ahead of Washington.

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Respectfully submitted,

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